

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT

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In re:	: Chapter 9
CITY OF DETROIT, MICHIGAN,	: Case No.: 13-53846
Debtor.	: Hon. Steven W. Rhodes
-----X	

**NOTICE OF PROPOSED ORDER APPROVING THE STIPULATION
MODIFYING CERTAIN DEADLINES ESTABLISHED IN THE
FOURTH AND FIFTH AMENDED ORDERS ESTABLISHING
PROCEDURES, DEADLINES AND HEARING DATES
RELATING TO THE DEBTOR’S PLAN OF ADJUSTMENT**

PLEASE TAKE NOTICE that the International Union, United
Automobile, Aerospace and Agricultural Implement Workers of America
("UAW") has filed a proposed order approving a stipulation with the City of
Detroit (the "City") for the limited purposes of extending the UAW's deadlines to
file an objection to confirmation of the Debtor's Plan of Adjustment and list of fact
witnesses to August 1, 2014. The proposed order is attached hereto as Exhibit 1.

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Dated: July 29, 2014

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EXHIBIT 1

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT

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	:	
In re:	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No.: 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
-----	X	

**ORDER MODIFYING CERTAIN DEADLINES ESTABLISHED
IN THE FOURTH AMENDED ORDER AND FIFTH AMENDED ORDER
ESTABLISHING PROCEDURES, DEADLINES AND HEARING DATES
RELATING TO THE DEBTOR’S PLAN OF ADJUSTMENT**

The Stipulation Modifying Certain Deadlines Established in the Fourth and Fifth Amended Orders Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment (the “Stipulation”), attached hereto as Exhibit A, having been entered into by the City of Detroit and the UAW; the Court having reviewed the Stipulation; and the Court being fully advised in the premises;

IT IS HEREBY ORDERED THAT the Stipulation is APPROVED.

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT

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	:	
In re:	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No.: 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
-----	X	

**STIPULATION MODIFYING CERTAIN DEADLINES
ESTABLISHED IN THE FOURTH AMENDED ORDER AND
FIFTH AMENDED ORDER ESTABLISHING PROCEDURES,
DEADLINES AND HEARING DATES RELATING TO THE
DEBTOR’S PLAN OF ADJUSTMENT**

This Stipulation is made by and among the International Union,
United Automobile, Aerospace and Agricultural Implement Workers of America
(“UAW”) and the City of Detroit (the “City”) (together with the City, the
“Parties”). By and through each of their undersigned counsel, the Parties have
reached an agreement with respect to, and request the entry of an order approving,
the following:

RECITALS

1. The Court entered the Fourth Amended Order Establishing
Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of
Adjustment (Docket No. 4202) (the “Fourth Amended Scheduling Order”) (Docket

No. 4202) on April 21, 2014. The Fourth Amended Scheduling Order establishes certain dates for filing objections to the Fourth Amended Plan for the Adjustment of Debts of the City of Detroit (Docket No. 4392) (the “Plan”), sets hearing dates on confirmation of such plan, and establishes certain other deadlines related to pre-trial litigation in connection with confirmation of the Plan.

2. The Parties executed a stipulation dated May 9, 2014, as corrected and revised on May 12, 2014 (the “May 12 Stipulation”), that modified certain deadlines established by the Fourth Amended Scheduling Order. The May 12 Stipulation was approved by Order of the Court entered on May 12, 2014 (Docket No. 4617) (the “Corrected Order Modifying Certain Deadlines”).

3. On June 9, 2014, the Court entered its Fifth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment (Docket No. 5259) (the “Fifth Amended Scheduling Order”) pursuant to which certain hearing dates, objection deadlines and other deadlines set in the Fourth Amended Scheduling Order related to pre-trial litigation in connection with confirmation of the Plan were further modified but provided that the Corrected Order Modifying Certain Deadlines superseded such further modifications.

4. The Parties executed a stipulation dated June 20, 2014 (the “June Stipulation”), that modified certain deadlines established by the Fourth

Amended Scheduling Order. That Stipulation was approved by the Court by order dated June 20, 2014 (Docket No. 5499).

5. The UAW is the collective bargaining representative of certain employees of the City who are drawn from the following City bargaining units: civilian police investigators employed in the Police Department, City Law Department attorneys and paralegals, Water and Sewerage Department wastewater treatment operators and associated skilled trades workers. In addition, the UAW is the collective bargaining representative of certain employees of the Detroit Library Commission (the "DLC"). The UAW is a party to certain current collective bargaining agreements with the DLC. The foregoing UAW-represented employees, as well as retirees of the both the City and of the DLC from these bargaining units, are participants in the City of Detroit General Retirement System ("GRS").

6. In connection with the City's Chapter 9 case, the UAW has served as a member of the Official Committee of Retirees, has participated in the Court-ordered mediation processes on behalf of both active and retired City employees, and is participating in the Coalition of unions that have been negotiating new labor agreements.

7. Paragraph 3 of the June Stipulation provides: "In the event that on or prior to July 21, 2014, it is determined by the Parties that any of Classes 10,

11 or 12 has voted to reject the Plan, or, UAW and DLC issues have not been mutually resolved by them, the UAW may file and serve its Conditional Objection to the Plan no later than July 22, 2014. Such Conditional Objection also may be supplemented to include objections arising from (a) the results of discovery, (b) the results of Plan voting and (c) events that occur on or after June 30, 2014.

8. On July 22, 2014 the Court approved a Stipulation extending the UAW's time to serve and file an objection to the City's Plan and to file its list of trial witnesses to July 29, 2014. That Stipulation was approved by the Court by order dated June 23, 2014 (Docket No. 6186).

9. On July 25, the City filed its Fifth Amended Plan for the Adjustment of Debts of the City of Detroit (Docket No. 6257).

10. The UAW and DLC issues have not been mutually resolved by them. Settlement discussions continue in earnest.

11. In light of the above circumstances, the parties have agreed to extend the UAW's time to file an objection to the Plan, and UAW's list of trial witnesses, until August 1, 2014.

STIPULATION

NOW, THEREFORE, it is hereby stipulated and agreed by and among the Parties, through their undersigned counsel:

A. The UAW may file and serve its objection to confirmation of the City's Plan and list of trial witnesses on or before August 1, 2014.

B. The provisions of the Fourth and Fifth Amended Scheduling Orders and the June Stipulation remain in full force and effect, except as modified by this Stipulation.

Dated: July 29, 2014

/s/ Babette A. Ceccotti

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Attorneys for the City of Detroit

CERTIFICATE OF SERVICE

I, Babette Ceccotti, hereby certify that the foregoing Stipulation
Modifying Certain Deadlines Established in the Fourth Amended Order
Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's
Plan of Adjustment was filed and served via the Court's electronic case filing and
noticing system on this 29th day of July, 2014.

Dated: July 29, 2014

/s/ Babette A. Ceccotti

Babette A. Ceccotti